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June 5, 2025

VIA ECF

Honorable Laura Taylor Swain
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

***Re: United States vs. Cristian Costea
19-CR-651 (LTS)***

Dear Judge Swain:

I am writing to respectfully request the return of Mr. Costea's iPhone and passport. I have been advised by US Probation Officer Alecia D. Ogir, that Probation has no objection to this request.

I also respectfully request that Mr. Costea's home confinement be modified, so that he would be able to have more time to do things with his children, personal errands, etc. US Probation Officer Alecia D. Ogir advised that curfew just allows them to make other adjustments, should a request be made.

Mr. Costea respectfully request permission to travel to Crystal Brook Resort and Mountain in Round Top, New York, from June 6th, 2025 to June 8th, 2025 with his brother and family, Probation does not oppose this request. The Government would have no objection, if Probation consents. Please accept my apology for this late request.

Permit me to respectfully thank you for your consideration.

Respectfully submitted,

Jake LaSala

JAKE LASALA, ESQ.

Because the Probation Office has advised the Court that defense counsel did not use the correct procedure or obtain Probation's consent prior to requesting (1) permission for Mr. Costea to travel and (2) the return of Mr. Costea's iPhone and passport, those requests are denied without prejudice to proper renewal. Defendant's request for the modification of his home confinement is unclear and is also denied without prejudice to proper renewal. DE 1590 resolved.

SO ORDERED

6/5/2025

/s/ Laura Taylor Swain, Chief USDJ